Data Gaps clarification Meeting
December 13, 2005
Olympic Club and Hotel
Centralia, Washington

Focus on technical issues, setting policy and legal issues aside for now

Goal: provide high-level clarification on 12/2 data gaps memo.
Avoid getting into too much detail; discuss question and concerns; determine path forward; get technical clarification on the biggest issues.

CSM Overview

1. What amount of data exists to characterize upstream and downstream areas?
2. How to link hotspots above site and Willamette Falls to contaminant levels within the site?
3. If hotspots are found near Falls, what would next steps be to address them?
4. Do we know enough about upstream of the Falls to justify studies and inform a study design?
5. Are we more concerned about regular migration of contaminants down to RM 14 or movement of contaminants in big water events?
6. Regarding background, boundary, and recontamination issues, does EPA envision an upstream boundary with background levels defined upstream of boundary?
7. How do we design a study upstream of the Falls, and what does it tell us?
8. Is understanding background the only purpose for upstream fish tissue collection?
9. On downstream end (Multnomah Channel), how far would you look at upper end? Is there value in a sediment trap at the channel mouth?
10. Are there any timing issues for FSPs or the project related to this sampling work?
11. How do we distinguish between different sources in Multnomah Channel area, where we may have 2-directional sediment movement?
12. Is there desire to get another transect above RM 11? How much of that data is needed, and is it seasonal?

Fate and Transport, Food Web Modeling Needs

1. How do we use the mass-balance model to get to concentrations in sediment?
2. Mass-balance models often don't balance; how are placeholders used when the model doesn't balance the way it needs to?
3. Does uncertainty in the model lead to a more detailed study effort, or to a management decision?
4. Does the code linking Fate and Transport to FWM exist?
5. What will we be collecting in R3 for Fate and Transport and FWM, and how should the data be collected?
6. Can we run the model with the data we have now?
7. If we break the river into segments, will we need to rethink the use of one average concentration for the whole river; need to look at the data needs for this?

8. Will EPA tell us what parameters need additional data collection, and which can be estimate from existing information?
9. What are advantages and disadvantages of predicting tissue recovery times, given the model uncertainties?
10. How much additional confidence and rigor will this bring to the recontamination, MNR, and FW evaluations?
11. What are the schedule implications of embarking on this course?

This is a broader question that applies to all areas*

Areas of potential concern

1. The table provides surface and subsurface data needs, but the memo text says that there is a need to know the level of certainty and cleanup goals to design sampling plans. Is there contradiction here?
2. Where does riparian soil and plant tissue fit into Nature and Extent and Risk Assessment?
3. The identified source area information to be collected by DEQ; will that fit into the FT in river? Is that info developed under DEQ's source control (yes)
4. Would we measure loading over various flow regimes? (Need to make sure upland and inwater data needs and scheduling match up)
5. How does EPA want COI data gaps to be filled, especially new COIs?
6. Has EPA mapped the OHWM-MHWM zone? Do you have a clear definition of these two lines? How are they defined?

Ecorisk Assessment

1. Does "deleterious effects" equal growth, reproduction, survival, or is it more than that?
2. Reducing potential for "exposure" seems different than reducing "risk". Can we change the language to make it less broad?
3. Is the goal purely for CERCLA, or does it go beyond it to NRDA?
4. Terrestrial plans – will be assessed by upland RPs (to add footnote to the CSM).
5. Is riparian area a data gap? Yes, but/and need to assess what data we have at uplands.
6. How ill various additional lines of evidence in risk approach be used in decision-making?
7. Is there a shift toward assessing risks to individuals, rather than to populations? (including non-listed species)
8. Why are we not comfortable with estimating population risk through compositing?
9. What uncertainty are we willing to accept in the ERA? Relying on multiple lines of evidence to address the uncertainty?
10. If we sample individual fish, we may need to reduce the COPC list (sculpin may be only problematic species)?
11. Integration of RI/FS and NRDA – there needs to be a clear identification of NRDA data needs in the future. Everything in this memo is CERCLA related.

12. One “may be needed” part of the data needs table, will we work through this later?
13. What weights will the different LOEs have for assessing risk to dish from PAHs? Will empirical data take precedence over theoretical?
14. Will species sensitivity distributions rely on literature search? (yes)
15. How do we get sturgeon tissue, age classes to resolve risk issue? EPA partners and tribes can provide recommendations on what is needed for RI.
16. May need to clarify how strong the link is between olfactory effects and growth, survival, reproduction for adult Chinook.
17. Do we have criteria for determining how robust the BSAF relationship needs to be?
18. We saw poor sediment/sculpin relationship; we are hoping for a better relationship in fall 2005; for the AVS+SEM use, under what circumstances should LWG do this?
19. Can we consider other options for getting at bioavailability for benthic community? (yes)
20. Can we talk more about methods for filling benthic tissue gaps?
21. Can you clarify the use of data in FWM vs. calibration of model?
22. What will collection of fish eggs entail?
23. How will we compare egg TRVs to surface water concentrations?

Human Health Risk Assessment

1. The addition of bivalve ingestion as an exposure pathway – is there justification for using this anecdotal information?
2. Do we composite or combine all the bivalve data?
3. Do we need to incorporate all unique eating habits in the HHRA?
4. Will doing a residential drinking water scenario change our conclusions significantly?
5. Adding analytes (PBDEs) – will collecting additional data cause us to call existing data into question?
6. For upstream biota sampling – can we sample these without knowing what upstream boundary is? Is the purpose to understand background or ambient levels?
7. For additional smallmouth bass samples near specific sources, is the objective to evaluate specific sources or something else?
8. How important is it to pin down uncertainty in areas where risk to Human Health from eating fish is known? How does it affect fish tissue data needs?

Next Steps

Timeframe – would like to have a rough cut of scope and scale of data collection by mid-January.

Process options – EPA partners develop workplan or scope of work; OR,

LWG develops proposal; OR, combined efforts to do it collaboratively in smaller groups? A small group approach may be helpful to flesh out individual issues, to bring back for the bigger group.

Need to focus on finding a path forward to get to an endpoint.
A thorough analysis of R2 data could lead to full scoping of R3. But, we need to change our approach now and be very efficient without shortchanging issues.

Need to tease out key early items that need action and look at what's needed or not needed on deliverables list.

Try to separate schedule, budget, policy, legal, and technical issues to address them all effectively.

Need to provide LWG with direction on the comprehensive R2 site summary.